UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

NICHOLAS FITZGERALD, on behalf of himself and all others similarly situated,

Plaintiff,

Civil Action

-V.-

11-CV-04287 (KM)(MCA)

GANN LAW BOOKS, INC., GANN LEGAL EDUCATION FOUNDATION, INC. AND MICHAEL PROTZEL,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that pursuant to the Court's May 6, 2014 order, on November 13, 2014, at 10:00 a.m., the undersigned counsel for Plaintiff Nicholas Fitzgerald will move before the Honorable Kevin McNulty, U.S.D.J. at the United States District Court, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an order: (1) approving the Class Settlement; (2) approving the Class attorneys' application for fees, costs and expenses, and (3) approving an incentive award for Plaintiff.

Dated: New York, New York September 18, 2014

Respectfully submitted,

BELLIN & ASSOCIATES LLC

By: /s/Aytan Y. Bellin

Aytan Y. Bellin, Esq. White Plains, NY 10606 Tel: (914) 358-5345

Fax: (212) 571-0284

Aytan.Bellin@bellinlaw.com

-and-

SCHLAM STONE & DOLAN, LLP

Jeffrey M. Eilender, Esq. 26 Broadway New York, NY 10004 Tel: (212) 344-5400

Fax: (212) 344-7677

E-Mail: jme@schlamstone.com